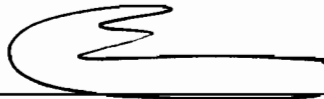


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:13CR222JAR(SPM)
)	
THOMAS ZELL,)	
)	
Defendant.)	

**MOTION FOR ADDITIONAL TIME TO OBTAIN AND REVIEW
DISCOVERY MATERIALS AND TO DETERMINE WHETHER,
AND/OR WHAT PRETRIAL MOTIONS ARE TO BE FILED**

Comes now the defendant, Thomas Zell, by and through undersigned counsel, and requests additional time in which to obtain and review discovery and to determine whether, and/or what, pretrial motions ought to be filed on behalf of the defendant. Counsel states that to deny defendant's request for such time would deny counsel for the defendant the reasonable time necessary for effective investigation and preparation of pretrial motions, taking into account the exercise of due diligence, and that the ends of justice are served by granting defendant's request.



Attorney for Defendant

11036766

Dated this 10th day of June, 2013.